



SDMS Document ID



EPA NO.

U590002

2118918

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

P3-1

REGION 8

999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

JAN 15 1999

Ref: 8ENF-T

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Faxed and Mailed

Mr. David Suhr
Idle Properties Manager
Hecla Mining Company
6500 Mineral Drive
Coeur d'Alene, ID 83815-8788Re: Hecla Pond, Paiute Reservation,
St. George, Utah

Dear Mr. Suhr:

As we discussed during our EPA inspection of your capped wastepile on November 16, 1998, EPA is requesting submittal of the following information related to this wastepile. Please submit this information within twenty (20) days of your receipt of this letter to my attention at the following address:

Linda Jacobson
EPA Region VIII, 8ENF-T
999 18th Street, Suite 500
Denver, CO 80202-2466

1. all documentation regarding the terms of sale to OMG-Apex, including requirements for cleanup/management of the feedstock, sludges, liquids, and ponds. Please include any requirements which address container storage, tank and pond storage areas. Please provide a detailed discussion which provides specifics on the pond rehabilitation, waste removal and relocation and pond refurbishment, including clean-up standards and confirmatory sampling results.



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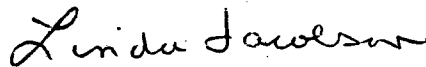
2. disposal records for solid and hazardous wastes, including bills of lading, manifests and accompanying LDR paperwork, recycling certifications, etc., for the timeframe from 1990 to 1995;
3. process flowcharts and detailed process descriptions for the plant units during gallium and germanium processing by St. George Mining. This should include identification of major chemical additives, such as compounds for pH adjustment, acids, solvents, cleaners, flocculents, etc. This discussion should also identify those activities or processes which were extraction/beneficiation or mineral processing activities. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.
4. process flowcharts and detailed process descriptions for the plant units during gallium and germanium (Ga/Ge) processing by Hecla. This should include identification of major chemical additives, such as compounds for pH adjustment, acids, solvents, cleaners, flocculents, etc. This discussion should also identify those activities or processes which were extraction/beneficiation or mineral processing activities. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.
5. a description of the ore types, feedstock sources, feedstock grade and any supporting analytical data or metal assays for the Ga/Ge and cobalt processing activities conducted by Hecla. Please include analytical data on the process streams.
6. process flowcharts and detailed process descriptions for the plant units during cobalt processing by Hecla. This should include identification of major chemical additives, such as compounds for pH adjustment, acids, solvents, cleaners, flocculents, etc. This discussion should also identify those activities or processes which were extraction/beneficiation or mineral processing activities. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.
7. feedstock records for the timeframe from 1990 through the date of purchase by OMG-Apex.
8. description of the origin (i.e., from Pond 1, Pond 2, etc.), the quantity and type of material, moisture content, characterization data for the materials placed in the current Hecla Pond. If there is no laboratory data, please provide a description which estimates the percentage of the metals present (i.e, 4% lead, 5% chromium, etc.) and other materials such as solvents or organics which could be present in the waste material.

9. a copy of the Closure Plan, or other such documents which address the dimensions, design, compaction and cap criteria for the construction and closure of the current Hecla pond.
10. a site layout map for the plant as it existed during ownership by the St. George Mining Company and list the years of ownership.
11. a site layout map for the plant as it existed during ownership by Hecla during the years of Ga/Ge and a site map during the years of Hecla cobalt processing. Please provide a discussion of process changes due to the conversion to cobalt processes, including the management, disposal, reuse or reclamation of remaining Ga/Ge feedstock, residues and waste materials.
12. copies of notifications, licenses, and permits for the plant during the years of St. George and Hecla operation.
13. copies of past and existing lease documents or contracts with the Bureau of Indian Affairs and the Paiute Tribe.
14. pond construction details, which identify the number of ponds and who constructed them. This discussion should address the pond maintenance activities during years of usage including specifics on debris and sediment removal such as volume removed, how it was managed, and any corresponding characterization data. This discussion should include the pond dimensions, pipelines or other conveyances interconnecting the ponds, materials of construction including liners and when such liners were installed. This discussion should describe which ponds were the primary wastewater recipient and which were backup ponds. A discussion of any pond releases or discharges including time frame, duration, and drainage to which the release flowed should be included.
15. an identification and description of feedstock and waste storage areas during the years of Hecla operation. Please indicate these on the appropriate plant layout maps requested in item 11 above.
16. copies of all site groundwater data, analytical data for the current Hecla Pond leachate and waste material, all analytical data for precipitation run on or runoff.
17. a discussion of Hecla's future plans regarding further capping, monitoring and maintenance, or reclamation of the current Hecla Pond, including any current detailed documents supporting such work.
18. a discussion of measures taken to address the condition of the small leachate ditch and small leachate pond as observed during the November 1998 inspection, specifically include measures taken to address holes in the liner and overflow from the pond and ditch.

You may request, in accordance with and subject to the limitations of 40 C.F.R. Part 2, treatment of certain information as Confidential Business Information (CBI). CBI requests must be made at the time of submission or such information may not be protected as CBI by EPA.

Please contact me directly at (303) 312-6503, if you have questions on this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Jacobson".

Linda Jacobson
Technical Enforcement Program

cc: Donna Inman, EPA